

Triton School Corporation

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Mason McIntyre, Athletic Director

December 21, 2015

REQUEST FOR WAIVER OF INVOICE DEADLINE

CC Docket No. 02-6

E-Rate Appeal Filed Electronically via the FCC ECFS System

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street SW
Washington, DC 20554

RE: Request for Waiver of Invoice Deadline and review of the Administrator's Decision on Invoice
Deadline Extension Request 471 Application: 951037
FRN: 2586386

Re: Applicant: Triton School Corporation
BEN: 130352
Form 471 Application Number: 951037
FRN: 2586386
Funding Year: 2014
Services: Telecommunications Service
Service Providers: Frontier North, Inc.
SPIN: 143004791

To Whom It May Concern:

This is a request for a waiver of Invoice Deadline and an appeal of the denial of the Administrator's Decision on Invoice Deadline Extension Request – Funding Year 2014 dated December 14, 2015 in connection with FRN 2586386 on 471 Application Number 951037. A copy of the Administrators Decision of Appeal is attached hereto as Exhibit A.

Text Being Requested for Review:

"Decision on Request: Dismissed

Explanation: Current deadline extension rules and procedures do not allow approval for the reason submitted."

Appeal Review Request:

USAC dismissed the invoice deadline extension request on the fact that "the current deadline extension rules and procedures do not allow approval for the reason submitted". The request for an invoice deadline extension was made so that Triton School Corporation could realize all of their available E-Rate funds associated with FRN 2586386. There were several factors that lead to incorrect information being inserted into the online BEAR, and thus the reason for this request. Discounts, or SPI, had been requested of Frontier North, Inc. on August 27, 2014 and then again on

December 8, 2014. Michelle Babcock, who was the Corporation Treasurer at the time of the discount requests, did not indicate that the Frontier bills were being discounted. Additionally, Frontier had not reported to USAC the proper Invoicing Mode. All reports that were created using the USAC Data Retrieval Tool reflected that the Invoicing Mode was "NOT SET". The Invoicing Mode reflected a "NOT SET" status as of October 21, 2015, when the online BEAR was submitted. The E-Rate Consultant received an email from Frontier North, Inc. on October 30, 2015 that the online BEAR (Invoice ID 2271953, submitted on October 21, 2015) created an issue for Triton School Corporation and that now the school had an E-Rate shortfall.

The School Corporation believes special circumstances warrant a deviation from the FCC general rules, and such deviation would better serve the public interest than strict adherence to the general rules. In addition, there is no evidence of waste, fraud or abuse, misuse of funds, or a failure to adhere to core program requirements. We believe that the denial of E-Rate funds for the full funding year inflicts undue hardship on the applicant. We respectfully request a waiver of all FCC rules regarding filing dates for Form 486 and change of contact information.

Attached documents which support The Request for Review

Exhibit A - Copy of Administrator's Decision on Invoice Deadline Extension Request - FY2014 - Dated December 14, 2015

Exhibit B - Copy of Discount Emails to Frontier North, Inc.

Exhibit C - Copy of USAC Funding Reports showing the Invoicing Mode had not been set.

Exhibit D - Copy of Emails from Frontier indicating that there was a BEAR issue.

Thank you for your time and consideration. You are hereby authorized to contact our E-Rate Contact, Charity Hawkins, if you have any questions concerning this appeal or require additional information. Her contact information is as follows:

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P.O. Box 97
Centerville, IN 47330
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Authorized Signature:



Tom McFarland, Business Manager, Triton School Corporation